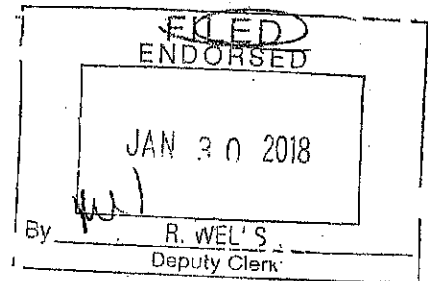


1 XAVIER BECERRA  
Attorney General of California  
2 MAGGY KRELL  
Supervising Deputy Attorney General  
3 CAROLINE CHEN  
Deputy Attorney General  
4 State Bar No. 213051  
455 Golden Gate Ave., Ste. 11000  
5 San Francisco, CA 94102  
Telephone: (415) 703-1205  
6 Fax: (916) 322-2368  
E-mail: Caroline.Chen@doj.ca.gov  
7 Attorneys for People of the State of California



8 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9 IN AND FOR THE COUNTY OF SACRAMENTO

10 PEOPLE OF THE STATE OF  
11 CALIFORNIA,

12 Plaintiffs,

13 v.

14 YUN CHEN AKA YUN ESCAMILLA AKA  
15 "ANGELA" (DOB:06/16/59),

16 Defendant.

Case No. SA 2015-00014

FELONY COMPLAINT

17 The People of the State of California upon oath of the undersigned, upon information and  
18 belief complain against the defendant above named for the crimes as follows:

19 COUNT ONE

20 (Penal Code section 266i(a)(3))

21 On or about April 30, 2015, at and in the County of Sacramento, DEFENDANT YUN  
22 CHEN AKA YUN ESCAMILLA did unlawfully commit the crime of pandering, in violation of  
23 Penal Code section 266i(a)(3), by procuring a place for another person, Jane Doe 1 identified as a  
24 girl coming out of the back area of the house located at 2208 Amanda Way, a house of  
25 prostitution.  
26  
27  
28

1  
2 **COUNT TWO**

3 **(Penal Code section 266i(a)(3))**

4 For a further and separate cause of action, being a different offense from, but connected in  
5 its commission with the charge set forth in Count one hereof, on or about April 30, 2015, at and  
6 in the County of Sacramento, DEFENDANT YUN CHEN AKA YUN ESCAMILLA did  
7 unlawfully commit the crime of pandering, in violation of Penal Code section 266i(a)(3), by  
8 procuring a place for another person, Jane Doe 2 identified as a young Asian female adult  
9 wearing a top and miniskirt, in a house of prostitution, located at 2208 Amanda Way.  
10

11 **COUNT THREE**

12 **(Penal Code section 266i(a)(3))**

13 For a further and separate cause of action, being a different offense from, but connected in  
14 its commission with the charges set forth in Counts one and two hereof, on or about December 3,  
15 2015, at and in the County of Sacramento, DEFENDANT YUN CHEN AKA YUN  
16 ESCAMILLA did unlawfully commit the crime of pandering, in violation of Penal Code section  
17 266i(a)(3), by procuring a place for another person, Jane Doe 3 identified as a female from Hong  
18 Kong, in a house of prostitution, located at 1651 Belinda Way.  
19

20 **COUNT FOUR**

21 **(Penal Code section 266i(a)(3))**

22 For a further and separate cause of action, being a different offense from, but connected in  
23 its commission with the charges set forth in Counts one through three hereof, on or about July 27,  
24 2017, at and in the County of Sacramento, DEFENDANT YUN CHEN AKA YUN  
25 ESCAMILLA did unlawfully commit the crime of pandering, in violation of Penal Code section  
26 266i(a)(3), by procuring a place for another person, Jane Doe 4 identified as a younger Asian  
27 female adult covered with a red robe, in a house of prostitution, located at 2425 52<sup>nd</sup> Avenue.  
28 ///

COUNT FIVE

(Penal Code section 266i(a)(3))

For a further and separate cause of action, being a different offense from, but connected in its commission with the charges set forth in Counts one through four hereof, on or about July 27, 2017, at and in the County of Sacramento, DEFENDANT YUN CHEN AKA YUN ESCAMILLA did unlawfully commit the crime of pandering, in violation of Penal Code section 266i(a)(3), by procuring a place for another person, Jane Doe 5 identified as young Asian female adult standing in the first bathroom doorway in a black robe, in a house of prostitution, located at 2425 52<sup>nd</sup> Avenue.

NOTICE: Penal Code section 1203.065(a) prohibits a grant of probation for these offenses.

I declare under the penalty of perjury that the foregoing is true and correct. Executed this 26 day of January, 2018, at San Francisco, California.

Dated: January 26, 2018

Respectfully Submitted,

XAVIER BECERRA  
Attorney General of California



CAROLINE CHEN  
Deputy Attorney General  
*Attorneys for People*